

EXHIBIT C

From: John Ryan
Sent: Monday, February 10, 2020 9:35 AM
To: Clint Cowan
Cc: Kent Krabill; Emily Burch; Kharishma Patel
Subject: RE: Aptive v. East Rockaway 19-cv-03365

That is not acceptable. The fee is not unconstitutional. Continuation of this litigation would be frivolous. My client is left with no alternative but to move for summary judgement and request attorneys' fees and sanctions.

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From: Clint Cowan <Ccowan@lynnllp.com>
Sent: Monday, February 10, 2020 9:28 AM
To: John Ryan <JRyan@RBDLLP.net>
Cc: Kent Krabill <kkrabill@lynnllp.com>; Emily Burch <eburch@lynnllp.com>; Kharishma Patel <kpatel@lynnllp.com>
Subject: RE: Aptive v. East Rockaway 19-cv-03365

*****Confidential Settlement Communication, protected by Fed. R. Evid. 408*****

Thanks for sending, John. Thank you also for hosting the deposition at your office.

Unfortunately, this document does not provide any evidentiary justification for the \$200 Fee.

We would be happy to avoid motion practice as well, but that would require the Village to (a) lower its fee to a constitutional level of \$25-\$50, and
(b) pay the attorneys' fees and costs incurred by Aptive from the beginning of this action through February 10th, 2020.

Barring such an agreement, we will have to move forward to seek a preliminary and permanent injunction of the Fee.

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From: John Ryan <JRyan@RBDLLP.net>
Sent: Friday, February 7, 2020 9:04 AM
To: Clint Cowan <Ccowan@lynnllp.com>
Subject: Aptive v. East Rockaway 19-cv-03365

The attachment contains the documents discussed at yesterday's deposition. Please consider this as a formal request on behalf of the Village of East Rockaway to voluntarily discontinue this action so that motion practice can be avoided.

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From: Reception <Reception@RBDLLP.net>
Sent: Friday, February 07, 2020 9:52 AM
To: John Ryan <JRyan@RBDLLP.net>
Subject: EAST ROCKAWAY LOCAL LAW #2

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